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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$282,500.00 IN
U.S. CURRENCY,

Defendant.

2:24-MC-00317-DJC-CKD

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Ronnie Borrego ("claimant"), by and through their respective counsel, as follows:

1. On or about May 15, 2024, claimant filed a claim in the administrative forfeiture proceeding with the Drug Enforcement Administration with respect to the above-referenced currency (hereafter "defendant currency"), which was seized on or about February 9, 2024.

2. The Drug Enforcement Administration has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

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1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant
3 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
4 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
5 parties. That deadline was August 13, 2024.

6 4. By Stipulation and Order filed August 13, 2024, the parties stipulated to extend to October
7 11, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed October 8, 2024, the parties stipulated to extend to
11 December 10, 2024, the time in which the United States is required to file a civil complaint for forfeiture
12 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
13 subject to forfeiture.

14 6. By Stipulation and Order filed December 9, 2024, the parties stipulated to extend to
15 February 7, 2025, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
17 subject to forfeiture.

18 7. By Stipulation and Order filed February 6, 2025, the parties stipulated to extend to March
19 10, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the
20 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
21 forfeiture.

22 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
23 to April 24, 2025, the time in which the United States is required to file a civil complaint for forfeiture
24 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
25 subject to forfeiture.

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1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to April 24, 2025.

4 Dated: 3/7/2025

MICHELE BECKWITH
Acting United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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8 Dated: 3/7/2025

/s/ Isaac Safier
ISAAC SAFIER
Attorney for potential claimant
Ronnie Borrego
(Authorized by email)

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12 **IT IS SO ORDERED.**

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14 Dated: March 10, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE